## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, on behalf of himself and all others similarly situated,

Plaintiff,

Civil Action No. 1:19-cv-12235-LTS

v.

QUOTEWIZARD.COM, LLC,

Defendant.

## **DECLARATION OF JASON KREVITSKY**

- I, Jason Krevitsky, do hereby declare as follows:
- 1. I am over the age of 18 and competent to sign this Declaration. I submit this Declaration for Defendant QuoteWizard.com, LLC ("QuoteWizard"). I make this Declaration based on my personal knowledge of QuoteWizard's corporate records and practices. If called as a witness, I could and would testify competently to the matters stated herein.
- 2. I am employed by QuoteWizard as Director, Engineering. I am familiar with and have personal knowledge of QuoteWizard's business practices and records discussed herein in that role.
- 3. In my role as Director of Engineering, I am familiar with QuoteWizard's business relationship and operations with Drips Holdings, LLC ("Drips").
- 4. QuoteWizard does not receive from Drips in the ordinary course of business any text messages or other communications sent to or received by Drips with consumers on QuoteWizard's behalf. While QuoteWizard does know the messaging that has been approved by

QuoteWizard to send to consumers, it does not have in its possession, custody or control the actual communications sent by Drips to consumers or received by Drips from consumers.

5. In response to ECF No. 162, QuoteWizard has explored building a database that

will store all SMS communications between Drips and consumers on QuoteWizard's campaigns

up until the time of trial. QuoteWizard does not have any systems currently online to consume

such messages and communications, nor a dedicated space in any of our databases to store them.

6. QuoteWizard estimates that it would take approximately two to three weeks, at the

earliest, to build such processes/database and make it operational.

7. Moreover, QuoteWizard does not have, and will not have, control over whether

Drips complies with any request to start transferring this data, or how quickly it complies, or

whether the data being shared by Drips (if any) is complete and in its original format.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Executed this 30th day of March, 2021, at 2882 Prospect Park Drive, Suite 450, Rancho

Cordova, CA 95670.

[Signature on Next Page]

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DocuSigned by:

Jason krevitsky

Jason Krevitsky
Director, Engineering
QuoteWizard.com, LLC